

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

FILED
RICHARD W. NAGEL
CLERK OF COURT
2018 MAY 21 AM 11:30
U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WESTERN DIV. DAYTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LAITH WALEED ALEBBINI,

Defendant.

No. 3:17-CR-71-WHR

**FIRST SUPERSEDING
INDICTMENT**

18 U.S.C. § 2339B(a)(1)
Forfeiture

The Grand Jury for the Southern District of Ohio charges:

COUNT ONE
(18 U.S.C. § 2339B(a)(1))

On an exact date that is unknown, but at least by on or about April 26, 2017, in the Southern District of Ohio, and elsewhere, the defendant, **LAITH WALEED ALEBBINI**, having knowledge that the Islamic State of Iraq and al-Sham (also known as the Islamic State of Iraq and the Levant, Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Dawla al Islamiya, ISIL, and ISIS) (collectively “ISIS”) is a designated foreign terrorist organization, that ISIS has engaged or engages in terrorist activity, and that ISIS has engaged or engages in terrorism, knowingly attempted to provide material support and resources to a foreign terrorist organization (namely, ISIS), in the form of personnel (namely, himself) to work under ISIS’s direction and control.

In violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT TWO

(18 U.S.C. § 2339B(a)(1))

Between an exact beginning date that is unknown, but at least by on or about April 26, 2017, and the date of this First Superseding Indictment, in the Southern District of Ohio and elsewhere, the defendant, **LAITH WALEED ALEBBINI** (“Defendant”), having knowledge that the Islamic State of Iraq and al-Sham (also known as the Islamic State of Iraq and the Levant, Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Dawla al Islamiya, ISIL, and ISIS) (collectively “ISIS”) is a designated foreign terrorist organization, that ISIS has engaged or engages in terrorist activity, and that ISIS has engaged or engages in terrorism, conspired with at least one other person to provide material support and resources to a foreign terrorist organization (namely, ISIS), in the form of personnel (namely, at least Defendant) to work under ISIS’s direction and control.

In violation of Title 18, United States Code, Section 2339B(a)(1).

FORFEITURE

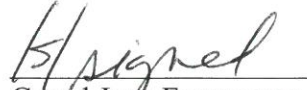
1. Upon conviction of any or all of the offenses charged in this First Superseding Indictment, the defendant, **LAITH WALEED ALEBBINI**, shall, pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 981(a)(1)(G)(i)-(iv), and 28 U.S.C. § 2461(c), forfeit to the United States:

- a. All of his assets, foreign or domestic (18 U.S.C. §§ 981(a)(1)(G)(i) and (iv) and 28 U.S.C. § 2461(c));
- b. All assets acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting, or concealing any of the offenses charged in this Indictment (18 U.S.C. § 981(a)(1)(G)(ii) and 28 U.S.C. § 2461(c));
- c. All assets derived from, involved in, or used or intended to be used to commit any of the offenses charged in the Indictment (18 U.S.C. § 981(a)(1)(G)(iii) and 28 U.S.C. § 2461(c));
- d. Any property, real or personal, which constitutes or is derived from proceeds traceable to any of the offenses charged the Indictment (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)).

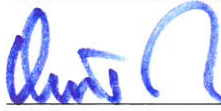
Such assets include, but are not limited to: (1) a black in color, “Blu” brand, cell phone with a

cracked screen, and (2) an HP laptop computer, model number 15-1233wm, bearing serial number appearing to be 5CD537AD81.

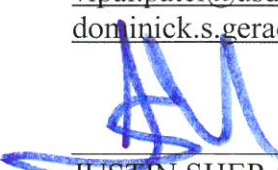
A True Bill.


Grand Jury Foreperson

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